

NOBLE

*NORTH OF BOSTON
LIBRARY EXCHANGE, INC.*

April 5, 2002

Re: CC Docket No. 02-6

The libraries of the North Of Boston Library Exchange (NOBLE) appreciate this opportunity to comment on possible changes to the Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6

Wide-Area Networks: Financial support for wide area network (WAN) services at the Priority One level is vitally important to our libraries (paragraph 18).

Through the WAN, libraries access the Internet and contracted electronic resources for research and education, and connect with shared servers including e-mail and the integrated library computer system to facilitate the sharing of resources among participating libraries.

The sharing of Internet connectivity by a consortium of libraries via a WAN is far more cost-effective than each location contracting for a separate Internet connection and therefore supports a fair and equitable distribution of program funds.

Basic connectivity equipment, such as routers and CSU/DSUs should also be treated as a first priority, for it is equally important to the actual telecommunications connectivity. These pieces of equipment should be differentiated from true internal connections equipment such as hubs, switches and internal cabling which are only internal equipment. The actual construction of WANs, in terms of creating an outside wiring network, should not be funded where leased options exist.

Purchased equipment (routers, DSU/CSUs) to support a WAN should certainly be treated in the same way as the identical equipment leased (paragraph 20). Ideally the subsidy should come all at once, since the libraries' capital outlay comes all at once to acquire the equipment (paragraph 19). Maintenance on routers and DSU/CSUs should also be considered a Priority One item since it is mandatory for the effective use of the equipment.

Without Priority One support of telecommunications services related to WANs, there would be less content available for internal connections. Internal LAN equipment such as cabling, hubs, switches, etc., should remain a secondary priority as at present.

Internet Access With Content: Content should continue to be ineligible for funding (paragraph 23-25). To maintain equal and fair support, the ruling should continue as at present. The bundling of content will be a slippery slope and difficult to enforce and therefore become inequitable.

*26 CHERRY HILL DRIVE, DANVERS, MA 01923 TELEPHONE (978) 777-8844 FAX (978) 750-8472
staff@noblenet.org*

Compliance with Americans with Disabilities Act: Enforcement of the Americans with Disabilities Act (paragraph 28-29) is beyond the scope of the E-rate program and should be left to other venues. For a consortium of independent institutions, it would be nearly impossible for the administrative entity to be responsible for enforcing this Act throughout dozen of scattered and independently governed locations.

Choice of Payment Method: Service providers should be required to give the option of paying only the discounted portion of bills and not require schools and libraries to seek after-the-fact funding through BEAR forms (paragraph 33-36). It is our experience that small vendors are more flexible and more willing to offer discounted billing than the large telecommunications utilities. Unfortunately, getting a BEAR form approved by the proper authority within a large corporation is often a time-consuming and frustrating process for schools and libraries. Greater attention should be given to maintaining a list of proper contacts for these issues.

Equipment Transferability: Commitments for retention and use by the applicant are certainly fair and should be required (paragraph 37-39). While the option of trade-in has merit, a vendor eager to sell new equipment could easily circumvent the requirement by offering an unreasonably low trade-in with the understanding that the equipment would be “resold” at the same low rate to another institution, thereby continuing the current practice of transferring heavily discounted equipment to other less qualified institutions. For this reason, the trade-in option should not be allowed and a three-year waiting period before transferring or replacing equipment should be required.

Excess Services: Services should be strictly limited to educational purposes in schools and libraries as at present (paragraph 41-47). Exceptions would be problematical and difficult and costly to enforce and dilute the emphasis and results of the e-rate program.

Unused Funds: Funds unspent in one year should be held over to enrich a following year’s pool to meet the objectives of the program (paragraph 63-70). Requests are far in excess of the funds available, and these unspent funds should be made available for the uses of the program, not to reduce telecommunications companies’ contributions.

Thank you for your consideration.

Ronald A. Gagnon
Executive Director